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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

PATHFINDER AVIATION, INC.,)
Plaintiff,) Case No.: 3:15-cv-00200-HRH
vs.)
XTO ENERGY, INC. and SCOTT)
GRIFFITH,)
Defendants.)

**PLAINTIFF'S CROSS-MOTION
FOR PERMISSION TO FILE AMENDED COMPLAINT**

COMES NOW Plaintiff, Pathfinder Aviation, Inc. ("Pathfinder"), by and through undersigned counsel, and hereby moves the court for permission to file an amended complaint. This motion is supported by the attached Opposition to Defendants' Motion to Dismiss and Memorandum in Support, affidavit and exhibits.

DATED this 25th day of November, 2015.

BIRCH HORTON BITTNER & CHEROT
Attorneys for Plaintiff

By: /s/ David Karl Gross

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 25th day of November, 2015, a true and correct copy of the foregoing was served on the following via the CM/ECF electronic delivery system:

Mr. Barat M. LaPorte
Oles Morrison Rinker & Baker LLP
laporte@oles.com

BIRCH HORTON BITTNER & CHEROT

By: /s/ David Karl Gross

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